



US CERTIFIED MAIL. RETURN RECEIPT REQUESTED.

December 12, 2016

Attention: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency (US EPA)
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Submission of November PM10 Monitoring Report
Pursuant to Clean Air Act, Section 114(a) Request
Amended Appendix B
Rain CII Carbon LLC, Robinson Calcining Plant
12187 East 950th Avenue, Robinson, Crawford County, Illinois

Dear US EPA Region 5 Compliance Tracker:

Rain CII Carbon LLC Robinson Calcining Plant (Rain CII) received an amended request for PM10 monitoring ("Appendix B") from US EPA Region 5 on October 22, 2015, in accordance with Section 114(a) of the Clean Air Act. Items 16 and 17 of the request require Rain CII to submit monthly reports of the PM10 monitoring and associated meteorological data to US EPA Region 5, whereas Items 10, 14, and 15 specify the content and format of the monthly reports.

In accordance with the requirements of the amended Section 114(a) request for PM10 monitoring, Rain CII is submitting, as enclosures, the following meteorological and PM10 monitoring data for November 2016:

- On compact disk (CD), Microsoft Excel file containing (1) hourly ASCII comma-delimited PM10 data, wind speed data, and wind direction data, and (2) one-hour and 24-hour average PM10 data correlated to one-hour and 24-hour average wind speed and wind direction data;
- log of November 2016 calibration data for the PM10 monitor and meteorological station;
- log of site visits and operator activities during November 2016;
- log of monitoring system downtime for the PM10 monitor and meteorological station during November 2016; and
- Log of observed interferences impacting PM10 levels at the facility during November 2016.

MAIN: 618-544-2193

RAIN CII CARBON LLC
12187 E. 950th AVE.
ROBINSON, IL 62454

FAX : 618-546-5123

As required by Item 17, Rain CII is also submitting electronic versions of the above referenced data to Dakota Prentice at US EPA Region 5.

Rain CII would like to note the following:

1. One-hour averages of PM10 which are higher than 0.150 mg/m³ are noted, along with the corresponding wind direction and speed during the time of each measurement.
2. The PM10 monitor reported multiple instances where it registered 1.985 mg/m³ for a total of 28 sample/hour. This occurrence was due to fairly significant maintenance as well as a tape error which was resolved on the morning of November the 3rd.
3. The PM10 monitor reported .811 mg/m³ and then gradually dropped back to typical levels. During the spike to .811 mg/m³ the monitor experienced a pressure drop. Which indicates filter tape being clogged and choking the flow. This appears to be the result of wet filter tape due to heavy rain moving through the area at that time. The values resulting from clogged tape (pressure drop) have been removed.
4. No other errors, aside from the above mentioned items/maintenance flags, were logged during the month of November 2016. After removing full-scale sample values and sample values believed to be the result of noise, the uptime for the PM10 Monitor for November 2016 was 96%.

Please contact me at (618) 546-6201, or at dan.fearday@raincarbon.com, if you require additional information regarding the submission of October PM10 monitoring data. Please direct technical questions regarding the submission to Bryan Schuetze, P.E. (Texas) at (985) 635-3412, or at bryan.schuetze@raincarbon.com.

Sincerely,



Dan Fearday
Plant Manager
Robinson Calcining Plant

Enclosures

cc: Dakota Prentice, US EPA Region 5